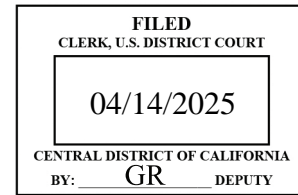




UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

Andrew Kyle White,

Defendants.

Case No. 2:25-mj-02199-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 6, 2025, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 641

Offense Description

Theft of Government Property

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/

Complainant's signature

Gary Sewell, Deputy Chief of Navy Police

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: April 14, 2025

Judge's signature

City and state: Los Angeles, California

Hon. Karen Stevenson, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Gary Sewell, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Andrew Kyle WHITE ("WHITE") for a violation of 18 U.S.C. § 641: Theft of Government Property ("Subject Offense").

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF AFFIANT

3. I have been a uniformed officer with the Department of Navy Police for 17 years. I am a graduate of the Uniformed Police Training Program at the Federal Law Enforcement Training Center at Glynco, Georgia. I attained a Bachelor of Science degree in Criminal Justice Administration and have attended numerous local and federal training classes. Prior to my law enforcement career, I was active-duty Navy as a "Master at Arms" specializing in Navy Security Forces in Coronado CA.

4. For the last three years, I have served as the "Deputy Chief of Police" for Naval Base Coronado where I oversee daily police operations, anti-terrorism, and force protection duties. Prior to that I have served in positions to include, training officer, watch commander, and patrol supervisor, and patrol officer responding to hundreds of trespassing incidents.

III. SUMMARY OF PROBABLE CAUSE

5. On April 6, 2025, WHITE landed his personal aircraft on the Naval Auxiliary Landing Field on San Clemente Island, without any prior authorization from any government entity. WHITE proceeded to steal a government vehicle, namely, a white Ford F150 truck with government license plate N9487226 ("Stolen F150"). WHITE crashed the Stolen F150 while still on San Clemente Island.

IV. STATEMENT OF PROBABLE CAUSE

6. Based on my review of law enforcement reports, video footage, my conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

7. On April 6, 2025, WHITE landed his private aircraft on San Clemente Island without prior authorization. San Clemente Island is a Naval Base, and the entire island is under the jurisdiction of Naval Base Coronado and utilized for military purposes. This was the second instance of WHITE landing on San Clemente Island without prior authorization.

8. At approximately 7:00 p.m. a Naval Watch Commander discovered WHITE's aircraft on the Naval Auxiliary Landing Field, with no one inside the aircraft, or near it.

9. At approximately 8:58 p.m., a Naval officer reported that the Stolen F150 was missing from a radar tower area known as Mount Thirst.

10. On April 7, 2025, at approximately 9:35 a.m. Naval officers viewed CCTV footage of WHITE walking on the base, approximately 7.3 miles away from where the Stolen F150 was later found. Officers responded to the area WHITE was walking and detained him. WHITE was found with a knife.

11. After his arrest, WHITE was Mirandized and told officers the location of the Stolen F150. At 12:00 p.m., officers located the Stolen F150 approximately 6.3 miles away from Mount Thirst, and discovered it was driven onto unpaved terrain and was stuck.

12. The F150 stolen by WHITE cost approximately \$18,223.

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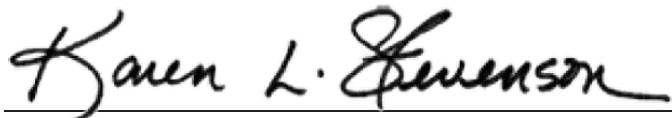
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V. CONCLUSION

13. For all of the reasons described above, there is probable cause to believe that WHITE has committed a violation of 18 U.S.C. § 641: Theft of Government Property.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 14th day of April, 2025.

A handwritten signature in black ink, reading "Karen L. Stevenson". The signature is written in a cursive, flowing style. The first name "Karen" is written in a larger, more prominent script, followed by "L." and "Stevenson". The signature is positioned above a horizontal line.

HONORABLE KAREN STEVENSON
UNITED STATES MAGISTRATE JUDGE